

CONNECTICUT



DEMOCRATS

STATE CHAIR NANCY J. DiNARDO

STATE VICE CHAIR DOMINIC F. BALLETT, JR.

SECRETARY BARBARA C. GORDON

TREASURER EMMA W. PIERCE

September 19, 2012

Anthony Herman, Esq.
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

MUR # 6654

Dear Mr. Herman:

On behalf of Connecticut Democratic Party, I am writing to bring to your attention a violation of federal campaign finance law by Roraback for Congress and Obstunik for Congress. Both committees are the principal campaign committees for Republican nominees for United States House of Representatives for the 2012 general election.

Attached as Exhibit A is a joint invitation sent out collectively by Roraback for Congress and Obstunik for Congress for a joint fundraising event held at the home of a supporter in Darien, Connecticut on September 18, 2012. The invitation purports to be for a joint event to support both candidates in support of their general election. The invitation does not make clear how contributions to the event are to be allocated, that donor's contributions will be subject to reallocation if they are maxed out to one committee or the other, nor does it explain that donors are permitted to earmark their contribution to one committee or the other as required by 11 C.F.R. § 102.17(c)(2). Furthermore, a search of Federal Election Commission records does not indicate that either committee has created a joint fundraising committee for the purpose of undertaking this event.

Federal Election Commission regulations require that such events be organized as a joint fundraising event in accordance with 11 C.F.R. § 102.17. These regulations ensure that joint events provide proper notice to donors as to the allocation of contributions, inform the general public that a joint event is being undertaken, and that fundraising expenses are properly allocated amongst its participants. In recent MUR 5780, the Commission held that a candidate for United States Senate and a party committee violated regulations for failing to establish a joint fundraising committee for a joint event that was held at

330 MAIN STREET, 3RD FLOOR • HARTFORD, CT 06106 • (860) 560-1775 • FAX (860) 560-1522

PAID FOR BY CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE, WWW.CTDEMS.ORG AND NOT AUTHORIZED BY ANY FEDERAL CANDIDATE OR CANDIDATE'S COMMITTEE.

CONTRIBUTIONS TO CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS UNDER THE INTERNAL REVENUE CODE.

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the same time and same place, and violated the Commission's donor notice requirements found in 11 C.F.R. § 102.17(c)(2).

In addition to the violations described above, it is our understanding that, in response to a question by a reporter, each committee subsequently attempted to hide the joint nature of the event by sending out subsequent invitations without referencing the other joint participant. A copy of what are believed to be these invitations are attached as Exhibit B.

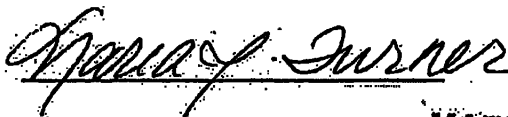
We request that the Commission investigate this violation of federal campaign finance regulations and seek any and all relief permitted by law, including but not limited to, injunctive relief, financial penalties and civil penalties similar to those levied by the Commission in MUR 5780.

Your consideration of this matter is much appreciated.

Sincerely,


Nancy DiMarzio,
Chairwoman, Connecticut
Democratic Party

SWORN TO AND SUBSCRIBED before me this 19th day of September, 2012



Notary Public

My Commission Expires:

MARIA I. TURNER
NOTARY PUBLIC
MY COMMISSION EXPIRES MAY 31, 2015

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EXHIBIT A



ANDREW
RORABACK
★ ★ CONGRESS ★ ★

HON. DAN DEBICELLA

ALONG WITH

HON. TONI BOUCHER
HON. LARRY CAFERO
ADAM DUNSBY
HON. SCOTT FRANTZ
FLIP HUFFARD
BILL LAVERACK
PETER & NAN LEVY

HON. JOHN MCKINNEY
HON. DICK MOCCIA
HON. JASON PERILLO
HON. JAYME STEVENSON
PETR THORSON
E. ROGER WILLIAMS
HON. TERRIE WOOD

INVITE YOU TO A COCKTAIL RECEPTION TO SUPPORT

U.S. CONGRESS CANDIDATES

**STEVE OBSITNIK, FOURTH CONGRESSIONAL DISTRICT
&
ANDREW RORABACK, FIFTH CONGRESSIONAL DISTRICT**

**TUESDAY, SEPTEMBER 18TH
6:00 P.M. - 7:30 P.M.**

AT THE HOME OF CYNTHIA & MAC BRIGHTON

DARIEN, CT

SUGGESTED CONTRIBUTION: \$500 PER CANDIDATE (\$1,000 TOTAL)

**PLEASE RSVP TO ALI ALMOUR AT
OR:**

PAID FOR BY OBSITNIK FOR CONGRESS & RORABACK FOR CONGRESS

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OBSITNIK FOR CONGRESS & RORABACK FOR CONGRESS

FUNDRAISER AT THE HOME OF CYNTHIA AND MAC BRIGHTON

☐ YES, I/WE WILL JOIN YOU ON SEPTEMBER 18TH. ENCLOSED IS MY CONTRIBUTION FOR \$_____ FOR _____ RESERVATIONS AT \$500 FOR OBSITNIK FOR CONGRESS AND \$500 FOR RORABACK FOR CONGRESS (COMBINED \$1000 PER PERSON).

☐ NO, I/WE CANNOT JOIN YOU, BUT AM ENCLOSING MY/OUR CHECK FOR \$_____.

PLEASE MAKE CHECKS PAYABLE TO:

OBSITNIK FOR CONGRESS
P.O. Box 730
NORWALK, CT 06850

RORABACK FOR CONGRESS
P.O. Box 807
TORRINGTON, CT 06790

I WILL PAY BY CREDIT CARD:

☐ VISA

☐ MASTER CARD

☐ AMEX

NAME (AS IT APPEARS ON CARD): _____

AMOUNT TO BE CHARGED: \$_____

CARD #: _____ EXP. DATE: _____

SIGNATURE: _____

FEDERAL LAW REQUIRES US TO USE OUR BEST EFFORTS TO COLLECT AND REPORT THE NAME, MAILING ADDRESS, EMPLOYER AND OCCUPATION OF EACH INDIVIDUAL WHOSE CONTRIBUTION(S) EXCEED \$200 IN AN ELECTION CYCLE.

FULL NAME: _____

EMPLOYER: _____ OCCUPATION: _____

ADDRESS: _____ CITY: _____ STATE: _____ ZIP: _____

SPOUSE'S NAME (IF JOINT CONTRIBUTION): _____ SPOUSE'S SIG.: _____

SPOUSE'S EMPLOYER: _____ SPOUSE'S OCCUPATION: _____

HOME PHONE: _____ WORK PHONE: _____ FAX: _____

E-MAIL: _____ MOBILE PHONE: _____

PERSONAL OR FEDERAL PAC FUNDS ONLY, PLEASE. FEDERAL LAW LIMITS CONTRIBUTIONS FROM INDIVIDUALS TO \$2,500 PER PERSON PER ELECTION CYCLE, BOTH PRIMARY & GENERAL ELECTIONS. CONTRIBUTIONS FROM CORPORATIONS AND FOREIGN NATIONALS ARE PROHIBITED. MULTI-CANDIDATE PACS MAY CONTRIBUTE \$5,000 PER ELECTION CYCLE. PARTNERSHIPS AND LIMITED LIABILITY COMPANIES (LLCS) MAY CONTRIBUTE THE SAME AMOUNT AS INDIVIDUALS (\$2,500) SO LONG AS THEY HAVE ELECTED TO BE TREATED AS A PARTNERSHIP FOR FEDERAL INCOME TAX PURPOSES AND NO PORTION OF THE CONTRIBUTION IS ATTRIBUTED TO A CORPORATION OR FOREIGN NATIONAL. PLEASE INCLUDE A LETTER ATTRIBUTING THE CONTRIBUTIONS AMONG THE INDIVIDUAL PARTNERS.

PAID FOR BY OBSITNIK FOR CONGRESS & RORABACK FOR CONGRESS

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EXHIBIT B



HON. DAN DEBICELLA

ALONG WITH

HON. TONI BOUCHER

HON. LARRY CAFERO

ADAM DUNSBY

HON. SCOTT FRANTZ

FLIP HUFFARD

BILL LAVERACK

PETER & NAN LEVY

HON. JOHN MCKINNEY

HON. DICK MOCCIA

HON. JASON PERILLO

HON. JAYME STEVENSON

PETR THORSON

E. ROGER WILLIAMS

HON. TERRIE WOOD

INVITE YOU TO A COCKTAIL RECEPTION TO SUPPORT

U.S. CONGRESS CANDIDATE

STEVE OBSITNIK, FOURTH CONGRESSIONAL DISTRICT

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AT THE HOME OF CYNTHIA & MAC BRIGHTON

DARREN, CT

SUGGESTED CONTRIBUTION: \$500 PER PERSON

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OR

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